

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**DARRYL ANDERSON, HORRIS
ANDREWS, OLIVIA BRACKINS,
GUYZARICK CARSAR FRAZIER,
DEANNA JACKSON, HARRY LETT,
ANGELA M. WILLIAMS, SHANETHA
R. ADAMS, KATINA BINION,
NORLINE BLACK, GENEVA BYNUM,
ANTHONY D. DAVIS, VELVERLYN
ANN GIBSON, VETA GRIFFIN,
WALTER J. HAMILTON, CLARICE
HICKS, LAQUNDA KEGLER,
ROY LEE KING, HORACE LOVE,
BRITANNICA MCCOY, CAROLYN
L. MCCOY, DON MURRY, BILLY
JOE NEWBY, FELISHA SIMON,
HATTIE N. SMITH, RANDY SOL JR.,
MICHELLE TILLER, KATRINA
WARD and ANNIE J. WOODLEY**

Plaintiffs,

v.

**PERDUE FARMS INCORPORATED,
a Maryland corporation doing business
in Alabama,**

Defendant.

**Case Action No.:
1:06-CV-1000-MEF-WC**

RENEWED MOTION FOR ADMISSION PRO HAC VICE

COMES NOW Defendant PERDUE FARMS INCORPORATED ("Perdue"), by and through its counsel, Sandra B. Reiss, and, for the second time, moves this Honorable Court to permit James J. Kelley to appear as co-counsel in the above-referenced case for the Defendant, Perdue Farms, Incorporated. In support of this motion, this Defendant presents the following facts:

1. James J. Kelley is a Partner and practicing lawyer with the firm of Morgan, Lewis & Bockius, LLP, in Washington, D.C. who has represented and continues to represent Defendant, Perdue Farms Incorporated, in certain employment matters.
2. James J. Kelley desires to appear as co-counsel in this case with his associate, Brian Z. Liss, whose admission has been approved by this Court and with Sandra B. Reiss, a shareholder in the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., Birmingham, Alabama, who has already appeared in this matter as counsel of record for Defendant, Perdue Farms, Inc.
3. James J. Kelley is admitted to practice before the U.S. Supreme Court, numerous United States Courts of Appeals and the Trial Bar of numerous United States District Courts and remains in good standing in each. The Affidavit of James J. Kelley is attached as Exhibit "A" in support of this motion.
4. On January 4, 2007, James J. Kelley moved for admission Pro Hac Vice in this matter but his motion was denied by this Court for failure to properly certify his admission to practice before the United States District Court for the district in which he resides or regularly practices law, in accordance with Local Rule 83.1. That oversight has been corrected with the revised Affidavit and its Exhibit A.
5. James J. Kelley agrees that, unless permitted to withdraw sooner by order of the Court, he will continue to represent Defendant Perdue in these proceedings until the final determination thereof, and that with reference to all matters incident to these proceedings, James J. Kelley shall be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the United States District Court, Middle District of Alabama, and the

Alabama State Bar in all respects as if he were a regularly admitted and licensed member of the Bar of Alabama in good standing.

WHEREFORE, Defendant requests an Order from the Court admitting James J. Kelley *Pro Hac Vice* to serve as co-counsel for the purpose of this litigation.

Respectfully Submitted this 22nd day of January, 2007.

/s/ Sandra B. Reiss

Sandra B. Reiss, Esq. (ASB-3650-S80S)

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

One Federal Place, Suite 1000

1819 5th Avenue North

Birmingham, Alabama 35203

E-mail: Sandra.Reiss@odnss.com

(205) 328-1900 (Telephone)

(205) 328-6000 (Facsimile)

Counsel for Defendant, Perdue Farms Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Renewed Motion for Admission Pro Hac Vice has been electronically filed on this **22nd day of January, 2007**, using the CM/ECF system which will send a notice of electronic filing as well as the full text of the Motion and attachment to counsel of record: Samuel A. Cherry, Jr., Lance H. Swanner, Joseph D. Lane, Robert Camp, and Bernard Nomberg, and Brian Liss, who are confirmed to be individually registered for e-filing and will receive the same electronically from the Court.

s/ Sandra B. Reiss

Sandra B. Reiss, Esq.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

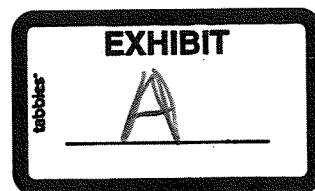
DARRYL ANDERSON, HORRIS)
ANDREWS, OLIVIA BRACKINS,)
GUYZARICK CARSAR FRAZIER,)
DEANNA JACKSON, HARRY LETT,)
ANGELA M. WILLIAMS, SHANETHA)
R. ADAMS, KATINA BINION,)
NORLINE BLACK, GENEVA BYNUM,)
ANTHONY D. DAVIS, VELVERLYN)
ANN GIBSON, VETA GRIFFIN,)
WALTER J. HAMILTON, CLARICE)
HICKS, LAQUNDA KEGLER,)
ROY LEE KING, HORACE LOVE,)
BRITANNICA MCCOY, CAROLYN)
L. MCCOY, DON MURRY, BILLY)
JOE NEWBY, FELISHA SIMON,)
HATTIE N. SMITH, RANDY SOL JR.,)
MICHELLE TILLER, KATRINA)
WARD and ANNIE J. WOODLEY)

Plaintiffs,

v.

PERDUE FARMS INCORPORATED,
a Maryland corporation doing business
in Alabama,

Defendant.



Case Action No.:
1:06-CV-1000-MEF-WC

JURY TRIAL DEMANDED

AFFIDAVIT OF JAMES J. KELLEY
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

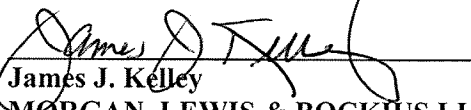
James J. Kelley having been duly sworn, deposes and states as follows:

1. I am an senior Partner with the law firm of Morgan, Lewis & Bockius LLP, which is representing the Defendant Perdue Farms Incorporated, in this case.

2. I have been a member, in good standing, of the Bar of the District of Columbia and the Commonwealth of Virginia since 1974.
3. I am authorized to practice before and am in good standing with the United States Supreme Court, the United States Court of Appeals for the First Circuit, Second Circuit, Fourth Circuit, Sixth Circuit and Eleventh Circuit.
4. I am also a member in good standing and admitted to practice before the Trial Bar of the United States District Court for the District of Maryland, the Eastern District of Virginia, the Western District of Virginia and of the District of Columbia. A Certificate in Good Standing from the United States District Court for the District of Columbia, the district in which my office is located and where I regularly practice, is attached hereto as "Exhibit A".
5. I certify that I have studied the local rules and agree that, unless permitted to withdraw sooner by order of the Court, will continue to represent the Defendant Perdue Farms, Inc., in these proceedings until the final determination thereof.
6. I understand that, with reference to all matters incident to these proceedings, I will be deemed to have conferred disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of, or in preparation for, proceedings in this case.


Dated: This 19 day of January, 2007.

Respectfully submitted,


James J. Kelley
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-739-5095
Telecopier: 202-739-3001

ATTORNEY FOR PERDUE FARMS, INC.

19th SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this
of January, 2007, to certify which I have set my hand and seal of office.



Notary Public in and for the
District of Columbia

My commission expires:

RHONDA D. ROLLERSON
NOTARY PUBLIC DISTRICT OF COLUMBIA
MY COMMISSION EXPIRES 2/14/2010

**United States District Court
for the District of Columbia
CLERK'S OFFICE
333 Constitution Avenue, NW
Washington, DC 20001**

I, **NANCY M. MAYER-WHITTINGTON**, Clerk of the United States

District Court for the District of Columbia, do hereby certify that:

JAMES J. KELLEY

was, on the 6th day of June A.D. 1983 admitted to practice as an Attorney
at Law at the Bar of this Court, and is, according to the records of this Court, a
member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court
in the City of Washington this 16th day of January A.D. 2007.

NANCY M. MAYER-WHITTINGTON, CLERK

By: _____

Sherry L. Han
Deputy Clerk

